

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CRUZ ALBERT SANTANA OTERO
GLORIBEL HERNANDEZ MOJICA

DEBTORS

CASE NO. 19-02940/ESL

CHAPTER 13

**MOTION REQUESTING ORDER OF APPROVAL
RE: DEBTORS' INTENTION TO PARTICIPATE IN A LOAN MODIFICATION
PROCESS THROUGH LOSS MITIGATION PROGRAM**

TO THE HONORABLE COURT:

NOW COME, CRUZ ALBERT SANTANA OTERO and GLORIBEL HERNANDEZ MOJICA, the Debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On May 27, 2019, the Debtors filed for protection under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§1301 et seq. The Debtors scheduled as one of their assets a real property located at Urb. Valle Los Prados G23 Tulipan Street Caguas, Puerto Rico. Said property has a lien with Banco Popular De Puerto Rico ("Banco Popular").

2. Due to Debtors' financial situation we are notifying this Honorable Court and all creditors of Debtors' intention to participate in a loan modification process through a loss mitigation program with secured creditor Banco Popular.

3. The Debtors hereby respectfully submit to the Court that they need the approval of this Honorable Court to continue the loan modification process through the loss mitigation program with Banco Popular. Once said modification is approved by the bank it will be submitted for evaluation to the Trustee in this case and to this Honorable Court for its approval.

WHEREFORE it is respectfully requested from this Honorable Court that an approval Order upon Debtors' intention to modify their mortgage loan through loss mitigation program be entered, in the above captioned case.

Page -2-
Debtor's Intention to Participate in Loss Mitigation Program
Case no. 19-02940/ESL13

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular US mail to the Debtors to their address of record and to all creditors and interested parties, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 1st day of July, 2019.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONERS
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Label Matrix for local noticing
0104-3
Case 15-02053-BKT13
District of Puerto Rico
Old San Juan
Mon Jul 1 11:46:04 AST 2019

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Navient Solutions, Inc. on behalf of USAF
Attn: Bankruptcy Litigation Unit E3149
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Portfolio Recovery Associates, LLC
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(d)RELIABLE FINANCIAL SERVICES, INC.
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(d)Quantum3 Group LLC as agent for
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